

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:23CR268
v.	§	Judge Jordan
	§	
ROBERTA MARIE KHAN (4)	§	
a/k/a Roberta Marie Khan,	§	
a/k/a Ember, a/k/a Scarecrow	§	

**FACTUAL BASIS**

The defendant, **Robberta Marie Khan**, stipulates and agrees that the following facts are true and correct:

1. The defendant, **Robberta Marie Khan a/k/a Roberta Marie Khan a/k/a Ember a/k/a Scarecrow (Khan)**, who is changing her plea to guilty, admits that she is the individual charged in the First Superseding Indictment.

2. As charged in Count One of the First Superseding Indictment, between on or about January 21, 2021, and on or about January 27, 2021, in the Eastern District of Texas, and elsewhere, **Khan** did knowingly attempt to persuade, induce, entice, or coerce an individual to travel in interstate commerce to engage in prostitution, and **Khan** aided and abetted others in persuading, inducing, enticing, or coercing an individual to travel in interstate commerce to engage in prostitution.

3. Specifically, at all times relevant to Count One of the First Superseding Indictment, **Khan** worked for and conspired with co-defendant William McKinnley Garland in a commercial sex operation. As part of that operation, **Khan** was aware that Jalen Alexander Bobo, and other members of the conspiracy, were communicating with

individuals they sought to bring into the operation. Specifically, **Khan** became aware that Bobo, Garland, and others began communicating with an individual, identified as “Victim 1,” about traveling from Ohio to Texas when Victim 1 was 17-years old.

4. **Khan** admits that she purchased, and caused to be purchased, a plane ticket for Victim 1 to travel in interstate commerce between Ohio and Texas once Victim 1 turned 18 years old. **Khan** knew that Victim 1 would be expected to engage in prostitution upon her arrival to Texas.

5. At all times, **Khan** knew and was aware that prostitution and commercial sex acts were and are illegal in the State of Texas, constituting violations of Texas Penal Code § 43.02 (prostitution) and § 43.04 (aggravated promotion of prostitution), and for which she and other members of the conspiracy could be punished.

6. **Khan** further admits that she picked Victim 1 up from the Dallas-Fort Worth International Airport and transported Victim 1 to a hotel located in the Eastern District of Texas. **Khan** purchased the hotel room. Once at the hotel, **Khan** introduced Victim 1 to Garland, after which Victim 1 was compelled into engaging in prostitution.

7. After arriving in North Texas, **Khan** admits that **Khan** was assigned to be Victim 1’s team lead. **Khan** drove Victim 1 to various hotels to engage in prostitution and commercial sex; purchased supplies and medication for Victim 1; and took the proceeds of the illegal sex to give to Garland, Anastasiya Claire Lyons, and others.


**SIGNATURE AND ACKNOWLEDGMENT BY DEFENDANT**  
**ROBERTA MARIE KHAN**

I have read this Factual Basis and have discussed it with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes my acts.

Dated: May 6<sup>th</sup> 2025  
\_\_\_\_\_  
ROBERTA MARIE KHAN  
Defendant

**SIGNATURE AND ACKNOWLEDGMENT BY ATTORNEY FOR DEFENDANT**

I have read this Factual Basis and the Indictment and have reviewed them with my client. Based upon my discussions with my client, I am satisfied that my client fully understands the Factual Basis.

Dated: 5-6-2025  
\_\_\_\_\_  
DARLINA C. CROWDER  
P. MICHAEL HAWK  
Attorneys for the defendant